

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X

UNITED STATES OF AMERICA,

v.

KEITH RANIERE,

Defendant.

-----X
Case No. 1:18-cr-00204-NGG-VMS

NOTICE OF MOTION

REQUEST FOR EVIDENTIARY HEARING

ORAL ARGUMENT REQUESTED

PLEASE TAKE NOTICE that upon this Memorandum of Law, dated May 3, 2022, the expert reports of Dr. J. Richard Kiper, Ph.D., PMP, Steven M. Abrams, J.D., M.S., and Wayne Norris, and the exhibits appended to the Memorandum, Mr. Keith Raniere, by and through his undersigned attorney, Joseph M. Tully, will move before the United States District Judge for the Eastern District of New York to whom this matter is assigned, for an order granting all appropriate relief under Rule 33 of the Federal Rules of Criminal Procedure, as well as all other relief that the Court deems just and proper under the circumstances.

Dated: May 3, 2022
Martinez, CA

Respectfully submitted,

/s/ Joseph M. Tully

Joseph M. Tully
CA SBN 201187
Tully & Weiss Attorneys at Law
713 Main Street
Martinez, CA 94553
Phone: (925) 229-9700
Fax: (925) 231-7754

TO: AUSA Tanya Hajjar
United States Attorney's Office
Eastern District of New York
271-A Cadman Plaza E.
Brooklyn, NY 11201